

# St. Paul - Our Lady of Vilna School

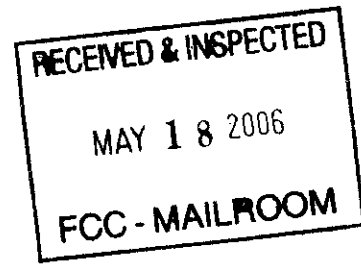
St. Paul Parish  
2114 West 22<sup>nd</sup> Place  
Chicago, IL 60608

DATE: 05/16/2006

**CC Docket Number No. 02-6**

Letter of Appeal / Request for Review  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL



RE: **Request for Review**

**Funding Commitment Decision Letter / Appeals Decision Letter**

Funding Commitment Decision Letter Date: January 6, 2006

**Administrator's Decision on Appeal Letter Date: 04/21/2006**

**CC Docket Number No. 02-6**

471 Application Number: 481180

Funding Year: 07/01/2005 – 06/30/2006

Funding Request Numbers:

FRN 1331853, 1332068, 1333217, 1333371, 1342035, 1342178,

Billed Entity: St. Paul – Our Lady of Vilna School

Billed Entity Number: 70054

CONTACT:

**Rev. Richard Todd**

**St. Paul – Our Lady of Vilna School**

**2127 W. 22<sup>nd</sup> Place**

**773 847 7622**

**773 847 8687**

**Richard\_Todd@claret.org**

No. of Copies rec'd 0  
List ABCDE

Dear Sirs:

This letter is submitted to appeal the Universal Service Administrative Company's (USAC) Funding Commitment Decision Letter dated January 6, 2006 (See Attachment A).

St. Paul – Our Lady of Vilna School would like to appeal the USAC's decision to deny funding under the explanation that no technology plan covering the current funding year was in place when the Form 470 was filed.

We contend that we did indeed satisfy the technology plan requirements of the Schools and Library Division of USAC.

The higher-level technology plan for the Schools in the Archdiocese of Chicago, of which St. Paul – Our Lady of Vilna School is a member, has had an approved technology plan, without interruption, since 1998. The National Catholic Educational Association approved the initial plan on February 11, 1998 (See Attachment C). The Illinois State Board of Education approved the 1st revision of the plan on July 2, 2002 (See Attachment D). The Catholic Conference of Illinois approved the latest plan revision on June 17, 2005 (See Attachment E).

Each version of the plan has updates but remains essentially the same plan. Attached is a chart (See Attachment B), which lists the goals of the 2002 plan and the 2005 plan. When you compare the two columns, you will see that the goals are almost identical. A closer examination of the strategies detailed in the plan document itself will also show a very close correlation between the two versions. (See attached copies of the 2002 and 2005 versions of the plan.)

Most importantly, you will note that the schools in question had been asking for a consistent "package" of e-rate eligible products and services, which include local and long distance wired and wireless voice services, dedicated internet access lines, and eligible CPE to access the internet. Our point here is if, the goals were similar -- and the products and services asked for by the schools remained constant -- why was the validity of the original plan questioned, and funding denied, with these applications?

We cite here the SLD's own direction on the matter:

#### **Technology Plan Scope and Timeframe**

---

##### **Scope**

Schools and libraries are not required to write or develop a separate Universal Service Fund technology plan. However, the approved plan must include a sufficient level of information to validate the purpose of a Universal Service Fund request. An approved technology plan does not have to include the specific details on required on the *Description of Services Requested and Certification Form* (Form 470), the *Services Ordered and Certification Form* (Form 471), the *Receipt of Service Confirmation Form* (Form 486), and the *Adjustment to Funding Commitment and Modification to Receipt of Service Confirmation Form* (Form 500).

<http://www.universalservice.org/sl/applicants/step02/technology-planning/default.aspx>

The schools in question had a valid technology plan that had more than enough detail to "validate the purpose of the Universal Service Fund request", per the SLD's direction on the matter.

### PIA Review

During the PIA review, vague questions such as, “When was the plan created?” Or, “When was the plan available?” were asked. The school gave the plan approval date not quite understanding what information was requested under the term, “created” or “available.”

When the Director of Technology of the Office of Catholic Schools in the Archdiocese of Chicago (the school system of which we are members) inquired on our behalf to the SLD as to the reason for the questions and the meanings of created or available, he was told, “We can’t tell you.”

We believe that this confusion led to the PIA review determining that we did not have a technology plan in place when, in fact, we have developed cooperative plans and implemented them over the past six years.

We note here that in a recent decision in regards to an appeal by the Pasadena, CA school district (see [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DA-06-486A1.doc](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-06-486A1.doc)), the FCC has asked the SLD for “reasonable inquiry by USAC and better communication between the USAC and the applicant could have resolved the issues” in this case.” We note here that the Chicago Archdiocese’s efforts to intervene on the matter should not have been dismissed or treated as irrelevant and could have addressed many of the issues here. In summary, there was a valid technology plan in place at the filing of the 470, there were efforts to make minor changes within that plan, and ultimately, the new plan was approved by June 30<sup>th</sup> and in time for the new funding year.

In summary, St. Paul – Our Lady of Vilna School believes that it was denied funding in error and requests USAC to award a Funding Commitment Decision favorable to our school.

Please do not hesitate to call our local school contact with any questions.

Sincerely,



Technical Coordinator



Principal

### **Attachments:**

Attachment A – Funding Commitment Decision Letter

Attachment B – Comparison of Technology Plans Goals

Attachment C – 1998 Technology Plan Approval Letter

Attachment D – 2002 Technology Plan Approval Letter

Attachment E – 2005 Technology Plan Approval Letter

Attachment F – Appeals Decision Letter

Complete 2002 Technology Plan for Schools in the Archdiocese of Chicago

Complete 2005 Technology Plan for Schools in the Archdiocese of Chicago



- A -

**Universal Service Administrative Company**  
Schools & Libraries Division

---

**FUNDING COMMITMENT DECISION LETTER**  
(Funding Year 2005: 07/01/2005 - 06/30/2006)

January 6, 2006

Richard Todd  
ST PAUL OUR LADY OF VILNA SCH  
2124 W 22ND PL  
CHICAGO, IL 60608-4004

Re: Form 471 Application Number: 481180  
Funding Year 2005: 07/01/2005 - 06/30/2006  
Billed Entity Number: 70054  
Billed Entity FCC RN:  
Applicant's Form Identifier: STPF471Y05

Thank you for your Funding Year 2005 E-rate application and for any assistance you provided throughout our review. Here is the current status of the funding request(s) featured in the Funding Commitment Report at the end of this letter.

- The amount, \$4,257.48 is "Approved."
- The amount, \$88,480.90 is "Denied."

Please refer to the Funding Commitment Report on the page following this letter for specific funding request decisions and explanations.

The Important Reminders and Deadlines immediately preceding this letter are provided to assist you throughout the application process.

**NEXT STEPS**

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements
- Review CIPA Requirements
- File Form 486
- Invoice the SLD using the Form 474 (service provider) or Form 472 (Billed Entity) - as products and services are being delivered and billed

**FUNDING COMMITMENT REPORT**

On the pages following this letter, we have provided a Funding Commitment Report for the Form 471 application cited above. The enclosed report includes a list of the Funding Request Number(s) (FRNs) from your application. The SLD is also sending this information to your service provider(s) so preparations can be made to begin implementing your E-rate discount(s) after you file your Form 486. Immediately preceding the Funding Commitment Report, you will find a guide that provides a definition for each line of the Report.

**TO APPEAL THIS DECISION:**

If you wish to appeal a decision in this letter, your appeal must be received by the SLD or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and (if available) e-mail address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:
  - Appellant name,

-A-

- Applicant name and service provider name, if different from appellant,
  - Applicant BEN and service provider SPIN,
  - Form 471 Application Number as assigned by the SLD,
  - "Funding Commitment Decision Letter for Funding Year 2005," AND
  - The exact text or the decision that you are appealing.
3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
  4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by the SLD's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by the SLD's decision.
  5. Provide an authorized signature on your letter of appeal.

To submit your appeal to the SLD by e-mail, use the "Submit a Question" feature on our web site at [www.sl.universalservice.org](http://www.sl.universalservice.org). Click "Continue," choose "Appeals" from the Topics Inquiry on the lower portion of your screen, and click "Go" to begin your appeal submission. The system will prompt you through the process. The SLD will automatically reply to incoming e-mails to confirm receipt.

To submit your appeal to the SLD by fax, fax your appeal to (973) 599-6542.

To submit your appeal to the SLD on paper, send your appeal to:

Letter of Appeal  
Schools and Libraries Division  
Box 125 - Correspondence Unit  
80 South Jefferson Road  
Whippany, NJ 07981

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use either the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our web site. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

#### NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Universal Service Support Mechanism. Applicants who have received funding commitments continue to be subject to audits and other reviews that the Universal Service Administrative Company (USAC) and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. The SLD may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by the SLD, the applicant, or the service provider. The SLD, and other appropriate authorities (including but not limited to USAC and the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division  
Universal Service Administrative Company

- A -

## A GUIDE TO THE FUNDING COMMITMENT REPORT

A report for each E-rate funding request from your application is attached to this letter. We are providing the following definitions for the items in that report.

**FORM 471 APPLICATION NUMBER:** The unique identifier assigned to a Form 471 application by the SLD.

**FUNDING REQUEST NUMBER (ERN):** A Funding Request Number is assigned by the SLD to each Block 5 of your Form 471. This number is used to report to applicants and service providers the status of individual funding requests submitted on a Form 471.

**FUNDING STATUS:** Each ERN will have one of the following definitions:

1. An ERN that is "Funded" is approved at the level that the SLD determined is appropriate for this ERN. The funding level will generally be the level requested unless the SLD determines during the application review process that some adjustment is appropriate.
2. An ERN that is "Not Funded" is one for which no funds were committed. The reason for the decision will be briefly explained in the "Funding Commitment Decision Explanation." An ERN may be "Not Funded" because the request does not comply with program rules, or because the total amount of funding available for this Funding Year was insufficient to fund all requests.
3. An ERN that is "As Yet Unfunded" reflects a temporary status that is assigned to an ERN when the SLD is uncertain at the time the letter is generated whether there will be sufficient funds to make commitments for requests for Internal Connections at a particular discount level. For example, if your application included requests for discounts on both Telecommunications Services and Internal Connections, you might receive a letter with funding commitments for your Telecommunications Services funding requests and a message that your Internal Connections requests are "As Yet Unfunded." You would receive one or more subsequent letters regarding the funding decision on your Internal Connections requests.

**CATEGORY OF SERVICE:** The type of service ordered from the service provider, as shown on your Form 471.

**FORM 470 APPLICATION NUMBER:** The Form 470 Application Number associated with this ERN from Block 5, Item 12 of the Form 471.

**SPIN (Service Provider Identification Number):** A unique number assigned by the Universal Service Administrative Company to service providers seeking payment from the Universal Service Fund for participating in the universal service support mechanisms. A SPIN is also used to verify delivery of services and to arrange for payment.

**SERVICE PROVIDER NAME:** The legal name of the service provider.

**CONTRACT NUMBER:** The number of the contract between the eligible party and the service provider. This will be present only if a contract number was provided on your Form 471.

**BILLING ACCOUNT NUMBER:** The account number that your service provider has established with you for billing purposes. This will be present only if a Billing Account Number was provided on your Form 471.

**SERVICE START DATE:** The Service Start Date for this ERN from Block 5, Item 19 of your Form 471.

**CONTRACT EXPIRATION DATE:** The Contract Expiration Date for this ERN from Block 5, Item 20b of your Form 471. This will be present only if a contract expiration date was provided on your Form 471.

**SITE IDENTIFIER:** The Entity Number listed in Form 471, Block 5, Item 22a. This will be present only for "site specific" ERNs.

**NUMBER OF MONTHS RECURRING SERVICE PROVIDED IN FUNDING YEAR:** The number of months of service that has been approved in the funding year. This will be present only for recurring services.

**ANNUAL PRE-DISCOUNT AMOUNT FOR ELIGIBLE RECURRING CHARGES:** Eligible monthly pre-discount amount approved for recurring charges multiplied by number of months of recurring service approved for the funding year.

-A-

**ANNUAL PRE-DISCOUNT AMOUNT FOR ELIGIBLE NON-RECURRING CHARGES:** Annual eligible non-recurring charges approved for the funding year.

**PRE-DISCOUNT AMOUNT:** Amount in Form 471, Block 5, Item 23I, as determined through the application review process.

**DISCOUNT PERCENTAGE APPROVED BY THE SLD:** The discount rate that the SLD has approved for this service.

**FUNDING COMMITMENT DECISION:** This represents the total amount of funding that the SLD has reserved to reimburse your service provider for the approved discounts for this service for this funding year. It is important that you and your service provider both recognize that the SLD should be invoiced and the SLD may direct disbursement of discounts only for eligible, approved services actually rendered.

**FUNDING COMMITMENT DECISION EXPLANATION:** This entry provides an explanation of the amount in the "Funding Commitment Decision."

**FCDL DATE:** The date of this Funding Commitment Decision Letter (FCDL).

**WAVE NUMBER:** The wave number assigned to FCDLs issued on this date.

-A-

FUNDING COMMITMENT REPORT  
Billed Entity Name: ST PAUL OUR LADY OF VILNA SCH  
BEN: 70054  
Funding Year: 2005

Form 471 Application Number: 481180  
✓ Funding Request Number: 1331853  
Funding Status: Not Funded  
Category of Service: Internal Connections  
Form 470 Application Number: 159500000  
SPIN: 143025704  
Service Provider Name: J & D Network Consultants  
Contract Number: N/A  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70060  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$24,870.00  
Pre-discount Amount: \$24,870.00  
Discount Percentage Approved by the SLD: N/A  
Funding Commitment Decision: \$0.00 - Technology Plan Required  
Funding Commitment Decision Explanation: No technology plan covering the current funding year was in place when the Form 470 was filed. A written technology plan is needed if seeking discounts for more than basic phone service

FCDL Date: 01/06/2006  
Wave Number: 028

✓ Funding Request Number: 1332068  
Funding Status: Not Funded  
Category of Service: Basic Maintenance of Internal Connection  
Form 470 Application Number: 159500000  
SPIN: 143025704  
Service Provider Name: J & D Network Consultants  
Contract Number: N/A  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$18,240.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$18,240.00  
Discount Percentage Approved by the SLD: N/A  
Funding Commitment Decision: \$0.00 - Technology Plan Required  
Funding Commitment Decision Explanation: No technology plan covering the current funding year was in place when the Form 470 was filed. A written technology plan is needed if seeking discounts for more than basic phone service

FCDL Date: 01/06/2006  
Wave Number: 028



-A-

FUNDING COMMITMENT REPORT  
Billed Entity Name: ST PAUL OUR LADY OF VILNA SCH  
BEN: 70054  
Funding Year: 2005

Form 471 Application Number: 481180  
✓Funding Request Number: 1333217  
Funding Status: Not Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 159500000  
SPIN: 143028030  
Service Provider Name: Technology Solutions Group, Inc.  
Contract Number: 110974  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70054  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$32,763.32  
Pre-discount Amount: \$32,763.32  
Discount Percentage Approved by the SLD: N/A  
Funding Commitment Decision: \$0.00 - Technology Plan Required  
Funding Commitment Decision Explanation: No technology plan covering the current funding year was in place when the Form 470 was filed. A written technology plan is needed if seeking discounts for more than basic phone service

FCDL Date: 01/06/2006  
Wave Number: 028

✓Funding Request Number: 1333371  
Funding Status: Not Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 159500000  
SPIN: 143028030  
Service Provider Name: Technology Solutions Group, Inc.  
Contract Number: 111006  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70060  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$18,264.59  
Pre-discount Amount: \$18,264.59  
Discount Percentage Approved by the SLD: N/A  
Funding Commitment Decision: \$0.00 - Technology Plan Required  
Funding Commitment Decision Explanation: No technology plan covering the current funding year was in place when the Form 470 was filed. A written technology plan is needed if seeking discounts for more than basic phone service

FCDL Date: 01/06/2006  
Wave Number: 028

-A-

**FUNDING COMMITMENT REPORT**  
Billed Entity Name: ST PAUL OUR LADY OF VILNA SCH  
BEN: 70054  
Funding Year: 2005

Form 471 Application Number: 481180  
Funding Request Number: 1341965  
Funding Status: Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 159500000  
SPIN: 143013194  
Service Provider Name: Nextel Communications, Inc.  
Contract Number: MTM  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70054  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$1,789.20  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$1,789.20  
Discount Percentage Approved by the SLD: 90%  
Funding Commitment Decision: \$1,610.28 - FRN approved as submitted

FCDL Date: 01/06/2006  
Wave Number: 028

*Sprint? Response  
for Audit. See  
02/08/2006  
Wanted  
Revised  
Submitted Ben*

✓ Funding Request Number: 1342035  
Funding Status: Not Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 159500000  
SPIN: 143001912  
Service Provider Name: SBC Illinois  
Contract Number: MTM  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70054  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$2,194.80  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$2,194.80  
Discount Percentage Approved by the SLD: N/A  
Funding Commitment Decision: \$0.00 - Technology Plan Required  
Funding Commitment Decision Explanation: No technology plan covering the current funding year was in place when the Form 470 was filed. A written technology plan is needed if seeking discounts for more than basic phone service.

*SBC*

FCDL Date: 01/06/2006  
Wave Number: 028

-A-

**FUNDING COMMITMENT REPORT**  
Billed Entity Name: ST PAUL OUR LADY OF VILNA SCH  
BEN: 70054  
Funding Year: 2005

Form 471 Application Number: 481180  
Funding Request Number: 1342085  
Funding Status: Funded ←  
Category of Service: Telecommunications Service  
Form 470 Application Number: 159500000  
SPIN: 143001192  
Service Provider Name: AT&T Corp.  
Contract Number: MTM  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70054  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$1,950.24  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$1,950.24  
Discount Percentage Approved by the SLD: 90%  
Funding Commitment Decision: \$1,755.22 - FRN approved as submitted

AT+T

FCDL Date: 01/06/2006  
Wave Number: 028

Funding Request Number: 1342131  
Funding Status: Funded ←  
Category of Service: Telecommunications Service  
Form 470 Application Number: 159500000  
SPIN: 143001912  
Service Provider Name: SBC Illinois  
Contract Number: MTM  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70060  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$797.64  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$797.64  
Discount Percentage Approved by the SLD: 90%  
Funding Commitment Decision: \$717.88 - FRN approved; modified by SLD  
Funding Commitment Decision Explanation: The estimated one-time and/or monthly charge was changed to reflect the documentation provided by the applicant.

SBC

FCDL Date: 01/06/2006  
Wave Number: 028

A-

**FUNDING COMMITMENT REPORT**  
Billed Entity Name: ST PAUL OUR LADY OF VILNA SCH  
BEN: 70054  
Funding Year: 2005

Form 471 Application Number: 481180  
✓Funding Request Number: 1342178  
Funding Status: Not Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 159500000  
SPIN: 143019614  
Service Provider Name: Sprint - Local Telephone Division  
Contract Number: MTM  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70054  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$1,979.40  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$1,979.40  
Discount Percentage Approved by the SLD: N/A  
Funding Commitment Decision: \$0.00 - Technology Plan Required  
Funding Commitment Decision Explanation: No technology plan covering the current funding year was in place when the Form 470 was filed. A written technology plan is needed if seeking discounts for more than basic phone service

Sprint

FCDL Date: 01/06/2006  
Wave Number: 028

Funding Request Number: 1342217  
Funding Status: Funded  
Category of Service: Telecommunications Service  
Form 470 Application Number: 159500000  
SPIN: 143001912  
Service Provider Name: SBC Illinois  
Contract Number: MTM  
Billing Account Number: N/A  
Service Start Date: 07/01/2005  
Contract Expiration Date: 06/30/2006  
Site Identifier: 70054  
Number of Months Recurring Service Provided in Funding Year: 12  
Annual Pre-discount Amount for Eligible Recurring Charges: \$193.44  
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00  
Pre-discount Amount: \$193.44  
Discount Percentage Approved by the SLD: 90%  
Funding Commitment Decision: \$174.10 - FRN approved as submitted

SBC

FCDL Date: 01/06/2006  
Wave Number: 028

-A-

## IMPORTANT REMINDERS & DEADLINES

Billed Entity Number : 70054

Name of Billed Entity: ST PAUL OUR LADY OF VILNA SCH

The following information is provided to assist you throughout the application process. We recommend that you keep it in an easily accessible location and that you share it with the appropriate members of your organization.

**FCC REGISTRATION NUMBERS (FCC RNs)** - Effective November 1, 2004, the FCC's Fifth Order (FCC 04-190 released August 13, 2004) requires E-rate program participants to have FCC Registration Numbers. Please continue to review our web site for additional guidance.

**FORM 486 DEADLINE** - The Form 486 must be postmarked no later than 120 days after the Service Start Date you report on the Form 486 or no later than 120 days after the date of the Funding Commitment Decision Letter, whichever is later. If you are required to have a Technology Plan, that plan must cover all 12 months of the funding year. You must indicate the name of the SLD-Certified Technology Plan Approver (TPA) prior to the commencement of discounted services for this funding year. You must indicate the name of the SLD-Certified TPA who approved your plan in your Form 486, and you must retain your approval letter and documentation of your monitoring of the progress toward your stated goals.

**CHILDREN'S INTERNET PROTECTION ACT (CIPA)** - Please review the CIPA guidance in the Form 486 Instructions, Section II, "IMPACT OF CIPA REQUIREMENTS ON FORM 486."

**INVOICE DEADLINE** - Invoices must be postmarked no later than 120 days after the last date to receive service - including extensions - or 120 days after the date of the Form 486 Notification Letter, whichever is later. Invoices should not be submitted until the invoiced products and services are being delivered and billed, and (for BEAR Forms) the provider has been paid.

**OBLIGATION TO PAY NON-DISCOUNT PORTION** - Applicants are required to pay the non-discount portion of the cost of the products and/or services. Service providers are required to bill applicants for the non-discount portion. The FCC has stated that requiring applicant to pay their share ensures efficiency and accountability in the program. FCC 04-190 concluded that a presumptively reasonable timeframe for a beneficiary to pay its non-discount share is 90 days after the completion of services. If you are using a trade-in as part of your non-discount portion, please refer to the web site for more information.

**DOCUMENTATION RETENTION** - FCC rules require that documents demonstrating compliance with the statute and Commission rules must be retained for a period of at least five years after the last day of service delivered. See "Document Retention Requirements" in FCC 04-190 for a descriptive list of many of the documents you must retain.

**SUSPENSION AND DEBARMENT** - Persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the Schools and Libraries Support Mechanism are subject to suspension and debarment from the program.

**FREE SERVICES ADVISORY** - Applicants and service providers are prohibited from using the Schools and Libraries Support Mechanism to subsidize the procurement of ineligible or unrequested products and services, or from participating in arrangements that have the effect of providing a discount level to applicants greater than that to which applicants are entitled.

**Complete program information** - including more information on these reminders - is posted to the SLD section of the USAC web site at [www.sl.universal-service.org](http://www.sl.universal-service.org). You may also contact the SLD Client Service Bureau by e-mail using the "Submit a Question" link on the web site, by fax at 1-888-276-8736 or by phone at 1-888-203-8100.

**Attachment B**  
**Comparison of Technology Plan Goals**

<b>2005 - 2008 Technology Integration Plan Goals</b>	<b>2002 - 2005 Technology Integration Plan</b>
Catholic schools, in partnership with the surrounding local and global communities, discover and leverage the educational, financial and technical resources available.	Catholic schools, in partnership with the surrounding local and global communities, discover and leverage the educational, financial and technical resources available.
Catholic schools strive for equity in Archdiocesan-wide uses of technology.	Catholic schools strive for equity in Archdiocesan-wide uses of technology.
Catholic schools utilize OCS and local resources to maximize Archdiocesan, school, family and community communication.	Catholic schools, in partnership with the associated local and global communities, leverage technology to enable and optimize communication and the exchange of information.
Catholic schools will develop local school addendums to the OCS plan incorporating the mission, vision and major goals and strategies.	Catholic schools will develop written technology plans that are based upon the mission, vision and belief statements and major goals of the OFFICE OF CATHOLIC SCHOOLS technology plan.
Catholic schools integrate diverse technologies identified by scientifically based research into the process of teaching, learning and assessing in all disciplines at all instructional levels.	Catholic schools integrate technology competencies into the process of content-based teaching and learning in all disciplines at all instructional levels.
Catholic schools, independently and collaborative use technology to communicate, access, analyze and evaluate information.	Catholic schools, independently and collaboratively use technology to communicate, access, analyze and evaluate information.
Catholic schools align technology initiatives with school improvement goals for curriculum, instruction, and assessment.	Catholic schools align technology initiatives with school improvement goals for curriculum, instruction, and assessment.
Catholic School professional staff (Administrators, Teachers, Librarians, Specialists) and support staff demonstrates competencies in technology skills and practices related to their responsibilities.	Catholic School professional staff (Administrators, Teachers, Librarians, Specialists) and support staff demonstrate competencies in technology skills and practices related to their responsibilities.

1  
2  
1

Building level administrators become technology leaders.	
	Professional development technology needs will be fully funded.
Professional Development in technology integration resources are identified and communicated to school personnel.	
	Professional development reflects current research and best practice.
Catholic schools provide professional development in technology to support and enhance curriculum, instruction and assessment.	Catholic schools provide professional development in technology to support and enhance curriculum, instruction and assessment.
Catholic schools have sufficient technology resources for teaching, learning, and management.	Catholic schools have sufficient technology resources for teaching, learning and management.
Catholic schools electronically network with the Archdiocese and each other.	Catholic schools electronically network with the Archdiocese and each other.
Catholic schools leverage resources and programs to ensure adequate technology services.	Catholic schools leverage resources and programs to ensure adequate technology services.
Catholic schools adopt technology policies for the acquisition, deployment, utilization and support of educational technology and school management.	Catholic schools adopt technology policies for the acquisition, deployment, utilization and support of educational technology and school management.
Catholic schools utilize electronic administrative management systems.	Catholic schools utilize administrative information management systems.

NCEA - C -



FEB 17 1998

NATIONAL  
CATHOLIC  
EDUCATIONAL  
ASSOCIATION

February 11, 1998

Elaine M. Schuster, Ph.D.  
Superintendent of Schools  
Archdiocese of Chicago  
155 E. Superior Street  
Chicago, IL 60611

Dear Dr. Schuster:

I am pleased to inform you that we have reviewed your technology plan and that it meets all five criteria established by the Schools and Libraries Corporation for participation in the Schools and Libraries Universal Service Program. Your plan is approved.

In order to receive program services, please note that you must indicate on FCC Form 486 that your plan has been approved by the **National Catholic Educational Association**.

Sincerely,

Lourdes Sheehan, RSM  
Executive Director  
Department of Chief Administrators of Catholic Education





# Illinois State Board of Education

100 West Randolph Street, Suite 14-300 • Chicago, Illinois 60601-3266-3169

Ronald J. Gidwitz  
Chairman

www.isbe.net

Raespicio F. Vazquez  
State Superintendent of Education

July 2, 2002

Mr. Mark Gartski  
Director of Technology - Office of Catholic Schools  
Archdiocese of Chicago  
155 E. Superior St.  
Chicago, IL 60611

## **CERTIFICATION OF TECHNOLOGY PLAN APPROVAL FOR SCHOOLS AND LIBRARIES UNIVERSAL SERVICE PROGRAM**

We are pleased to inform you that the Archdiocese of Chicago's Technology Plan has been reviewed by the Peer Review Group and has met the following standards and criteria as detailed for the Schools and Libraries Universal Service Program:

- (1) The Plan establishes clear goals and a realistic strategy for using telecommunications and other information technologies to improve teaching and learning.
- (2) The Plan has a professional development strategy to ensure that staff know how to use the new technologies to improve teaching and learning.
- (3) The Plan includes an assessment of the telecommunications services, hardware, software, professional development and other services that will be needed to implement the strategies to improve education.
- (4) The Plan provides a sufficient budget to acquire and maintain the hardware, software, and other services that will be needed to implement the strategy.
- (5) The Plan includes an evaluation process that enables a school to monitor progress toward the goals outlined in the Plan and make mid-course corrections in response to new developments and opportunities as they arise.

Ultimately, we stress that technology plans must not be viewed or treated as a separate exercise dealing primarily with hardware and telecommunications infrastructure. Instead, there must be strong connections between the Plan, your Staff professional development efforts, and your overall goals for improving teaching and learning.

While we realize that your planning scope may be longer, this approval is valid for the Universal Service Program for three (3) fiscal years from this date, ending June 30, 2005. At that time, your Plan will undergo a review and assessment as required by the Schools and Libraries Corporation.

*Thank You once again for your continued commitment to improve teaching and learning at your school. We wish you continued success in your efforts at securing the resources that go along with that important task.*

Sincerely,

Ricardo Tostado  
Policy Analyst  
Illinois State Board of Education - Learning Technologies

cc: Zach Wichmann -- IL Catholic Conference

65 East Wacker Place • Suite 1620  
Chicago, Illinois 60601  
(312) 368-1066  
FAX (312) 368-1090



108 East Cook Street  
Springfield, Illinois 62704  
(217) 528-9200  
FAX (217) 528-7214

June 17, 2005

Mr. Mark Garstki  
Archdiocese of Chicago  
155 E. Superior Street  
Chicago, IL 60611

**CERTIFICATION OF TECHNOLOGY PLAN APPROVAL FOR SCHOOLS AND LIBRARIES  
UNIVERSAL SERVICE PROGRAM**

We are pleased to inform you that the Archdiocese of Chicago School technology plan has been reviewed by the Peer Review Group and has met the following standards and criteria as detailed for the Schools and Libraries Universal Service Program:

- (1) The Plan establishes clear goals and a realistic strategy for using telecommunications and other information technologies to improve teaching and learning.
- (2) The Plan has a professional development strategy to ensure that staff know how to use the new technologies to improve teaching and learning.
- (3) The Plan includes an assessment of the telecommunications services, hardware, software, professional development and other services that will be needed to implement the strategies to improve education.
- (4) The Plan provides a sufficient budget to acquire and maintain the hardware, software, and other services that will be needed to implement the strategy.
- (5) The Plan includes an evaluation process that enables a school to monitor progress toward the goals outlined in the Plan and make mid-course corrections in response to new developments and opportunities as they arise.

Ultimately, we stress that technology plans must not be viewed or treated as a separate exercise dealing primarily with hardware and telecommunications infrastructure. Instead, there must be strong connections between the Plan, your Staff professional development efforts, and your overall goals for improving teaching and learning.

While we realize that your planning scope may be longer, this approval is valid for the Universal Service Program for three (3) fiscal and school years from this date, ending June 30, 2008. At that time, your Plan will undergo a review and assessment as required by the Schools and Libraries Corporation.

Thank you once again for your continued commitment to improve teaching and learning at your school. We wish you continued success in your efforts at securing the resources that go along with that important task.

Sincerely,

Zachary H. Wichmann  
Associate Director for Education



Universal Service Administrative Company  
Schools & Libraries Division

---

**Administrator's Decision on Appeal – Funding Year 2005-2006**

April 21, 2006

Reverend Richard Todd  
St. Paul Our Lady of Vilna School  
2127 West 22nd Place  
Chicago, IL 60608

Re: Applicant Name: ST PAUL OUR LADY OF VILNA SCH  
Billed Entity Number: 70054  
Form 471 Application Number: 481180  
Funding Request Number(s): 1331853, 1332068, 1333217, 1333371, 1342035,  
1342178  
Your Correspondence Dated: January 17, 2006

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of SLD's Funding Year 2005 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of SLD's decision. The date of this letter begins the 60-day time period for appealing this decision to the Federal Communications Commission (FCC). If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1331853, 1332068, 1333217, 1333371, 1342035,  
1342178

Decision on Appeal: **Denied**

Explanation:

- You are appealing the SLD's decision to deny the funding requests because you failed to provide a technology plan covering the current funding year (Funding Year 2005) when the Form 470 was filed. You contend that you did satisfy the technology plan requirements and that the higher level technology plan for the schools in the Archdiocese of Chicago, of which St. Paul-Our Lady of Vilna School is a member, has been approved since 1998.
- Upon review of the appeal letter and the relevant support documentation, it was determined that St. Paul-Our Lady of Vilna School did not have a technology plan covering the current funding year in place when the Form 470 was file. During

the Selective Review, you provided a technology plan, which was created on July 15, 2005. Per FCC guidelines, a technology plan must be in place when the establishing Form 470 is filed if seeking discounts for more than basic phone service. This rule was violated since the Form 470 was posted on January 20, 2005 and technology plan was created on or about July 15, 2005. The FRNs that were denied were requesting more than basic voice unbundled telecom services. You have failed to provide evidence that SLD has erred in its original decision. Based on information regarding the technology plan provided, SLD supports the denial of the applications. — F —

- On your Form 471, you certified that the recipients of products and/or service were covered by an individual and/or higher-level technology plan and that the technology plan had been approved or was in the process of being approved. During the review of your application, SLD requested that you provide a technology plan that was approved before the establishing Form 470 was posted. Since you failed to do this, SLD denies your appeal.
- Your Form 471 requested funding for products and services other than basic local and long distance telephone service. FCC rules require applicants to certify that the entities receiving products and/or services other than basic telephone service are covered by an individual and/or higher-level technology plan that has been, or is in the process of being approved. 47 C.F.R. § 54.504(b)(2)(vii); See Schools and Libraries Universal Service, Services Ordered and Certification Form, OMB 3060-0806 Block 6, item 26, 27 (*FCC Form 471*).

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either the SLD or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

- F -

Reverend Richard Todd  
St. Paul Our Lady of Vilna School  
2127 West 22nd Place  
Chicago, IL 60608

Billed Entity Number: 70054  
Form 471 Application Number: 481180  
Form 486 Application Number:



OFFICE OF CATHOLIC SCHOOLS  
— ARCHDIOCESE OF CHICAGO —

# Technology Plan

**Superintendent:** Nicholas M. Wolsonovich, Ph. D.  
**Address:** 155 E. Superior St., Chicago, IL 60611  
**Phone:** 312-751-5200  
**Contact Person:** Mark W. Garstki, Director of Technology  
**Phone:** 312-751-5223  
**E-mail:** mgarstki@archdiocese-chgo.org  
**Fax:** 312-751-5295

**Date Submitted:** June 16, 2002  
**Plan Years:** 2002 - 2005